



Affidant of Fact

Sister E Jones-Bey
Lyrisa Playhouse Moonish Sudbury Institute
P.O. Box 180
Bronx, New York 10472

Re: First Set of Interrogatories and Request
for Production of Documents

ISlam,

I Sister E Jones-Bey am writing
this letter in response to the interrogatories
and request for production of documents.

This request comes from the New York
City Law Department. These are the same
individuals liable for the actions of
the Defendant. All of the people listed
in the original claim submitted are
witnesses. The State of New York is
in possession of all documents needed
to prove my claim (Personal Injury
320 Assault, Slander, and libel Pursuant
to 42 U.S. Code § 1986.) All defendants
have the notes/records/ and documents
to prove all of my statements. I would
like to further state that this
request just further proves systematic
discrimination, lack of remorse for
the mental, physical, and emotional
trauma caused by the actions and

Inactions of all individuals whom are parties to this action. There are the definition of the terms and statement in my Complaint. All documents that I have you have as The New York City Law Department makes all of the directives by way of your Family Court Division. Josephine Antione has records. Administration for Children's Services (NYC Children) Ect.

Black's Law Dictionary 2nd Edition p 93 we find the definition for assault and aggravated assault

An assault is an attempt, with force or violence, to do a Corporal Injury to another, and may consist of any act tending to such corporal injury accompanied with such circumstances as denote at the same time an intention, coupled with present ability, of using actual violence against the person - *Hays v. People, 1 Hill (N.Y.) 351*

Aggravated assault is one committed with the intention of committing some additional crime; or one attended with circumstances of Peculiar outrage or atrocity.

"It is a well ~~known~~ ^{Recognized} principle that

the application of force or threat of application thereof, in an assault may be ~~directly~~ made directly ~~and~~ ~~indirectly~~ as well as indirectly. - Beauvillier v. United States 1939

On Page 719-720 we find the following Definition

Libel (in torts) - That which is written or printed and published, calculated to injure the Character of another by bringing him to ridicule, hatred, or Contempt. - Palmer v. Concord, 48 N.H. 211, 97 Am. Dec 605; Negly v. Farrow 60 Md 175, 45 Am. Rep 715; Weston v. Weston, 83 App. Div. 520 N.Y. Supp 351; Collins v. Dispatch Pub Co. 152 Pa 187 25 Atl 546, 34 Am. Rep. 636; Harvard v. State, 96 Ind 463, 45 Am Rep. 185

A libel is a false Malicious defamation of another, expressed in print or writing or pictures or signs tending to injure the reputation of an individual, and exposing him to public hatred, Contempt or ridicule. The publication of libelous matter is essential to recovery. Code Ga. 1982 § 2974

A libel is a malicious defamation,

expressed by writing, printing, or by signs or pictures or the like, tending to blacken the memory of one who is dead, or to impeach the honesty, integrity, virtue, or reputation or publish the natural or alleged defects of one who is alive, and thereby expose him to public hatred, Contempt, or ridicule. - Pen. Code Cal § 248; Rev Code Iowa 1880 § 4057; Bac Abr. tit "Libel"; 1 Harok P.C. 1, 13 §1; Com. v. Clap, 4 Mass. 168, 3 Am. Dec. 212; Clark v. Binney, 2 Pick (Mass.) 115; Ryckman v. Delevan, 2 Wend. (N.Y.) 198, Root v. King 7 Cow. (N.Y.) 620

"Please note that publication to any third person satisfies this requirement for defamation. Thus, publication to the plaintiff's friends, relatives, children and spouse will suffice. Further, the definition of publication is not limited to printed or oral statements. Any action by the defendant that causes a defamatory idea to be communicated to a third person about plaintiff is considered publication. *Kmart Corp v. Washington*, 866 P.2d 274 (Nev. 1993).

"It is the malicious intent of the libeller toward the injured individual that authorized the latter to seek redress.

The proof, or else the necessary presumption of individual malice, and inflicting individual injury are sole grounds of the civil action and the remedy it affords." Brady v. Ottaway Newspapers, 54 AD 2d 226-NY Appellate Div 2nd Dept 1961

For years, Administration for Children's Services unlawfully maintained files on myself and my hers, to no avail. Every case was dismissed and it is noted in Court record that Social Services workers were extremely biased and made decisions that was unjust due to their lack of knowledge of Moorish American Culture, Creed, Customs and practices. Because of the years of libel and slander I have been hindered from obtaining employment in my career field due to allegations by Child protective workers acting on statement made anonymously by individuals with ill and malicious intent towards me. I own my own business, if ~~people~~ anyone ran a background check, an extensive Children's Services Record appears, I cannot access everything, I have no clue what people whom have never met me are saying. But I am dealing with economic hardship, because of no assistance with the violations made by several of the terminated defendants. I have no relationship with my

blood relatives and the damage is irreparable,
Due to the Fraudulent and Slandorous
Statements, I was not afforded equal
protections at law when I reached
out concerning the abduction of my
eldest heir, Still to the writing of the
~~existing~~ document no assistance by any
agency in place. Still to date I am
dealing with harassment by yet another
landlord using deed fraud, intimidation,
abuse of legal process, identity theft,
mail tampering, Assault, Slander, and libel
as a way to defraud the government
out of finance.

The ~~the~~ Constitution, from its inception
was created to protect against attacks,
this is afforded to every citizen,

U.S. Stat 1 Article 3

"The Said States hereby severally enter
into a firm League of friendship with
each other, for their common defense, the
Security of their liberties, and general
welfare, binding themselves to assist each other
against all force offered to, or attacks
made upon them, or any of them,
on account of religion, Sovereignty, trade,
or any pretense whatever.

Bill of Rights Amendment I

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press, or of the right of the people to peaceably assemble, and to petition the government for a redress of grievances."

The officer requesting this inquiry was called by me yet they did not assist me they assisted Josephine Antoine and Grisel Cabon About my heirs by fraud, Slander, Intimidation, libel and assault by officer.

In Black's Law 2nd Edition on page 1092 We find

Slander (in torts) oral defamation; the speaking of false and malicious words concerning another, whereby injury results to his reputation. - Pollard v. Lyon, 91 U.S. 277, 23 L. Ed. 308; Fredrickson v. Johnson, 60 Minn. 337, 62 N.W. 388; Ross v. Ward, 14 S.D. 240, 85 N.W. 182 86 Am. St. Rep. 414; Republican Pub. Co. v. Mosman, 15 Colo. 399, 24 Pac. 1051; Civ. Code Gra 1895 § 3837

"Publication in the law of slander, means the transmission of ideas and thoughts to the perception of a person,

other than the party speaking and the
party spoken of." - Great ATL's Pac. Tea
Co. v. Paul A. 2d 731- Md, Court of
appeals 1970

In Black's law 9th Edition p 784

harassment - words, conduct, or action (usu.
Repeated or persistent) that, being directed
at a specific person, annoys, alarms or
causes substantial emotional distress in
that person and serves no legitimate
purpose.

P 731- 732

fraud 3. A tort arising from a
knowing misrepresentation made to induce
another to act in his or her detriment

Extrinsic fraud (1851) 1. Deception that is
collateral to the issues being ~~presented~~
considered in the case; intentional
misrepresentation or deceptive behavior
outside the transaction itself, (Whether
contract or lawsuit); depriving the party
of informed consent or full participation
2. Deception that prevents a person from
knowing about or asserting a certain
right

fraud on the court (1910) In a Judicial proceeding, a lawyer's or a Party's misconduct so serious it undermines or is intended to undermine the integrity of the proceeding.

In Black's Law 2nd Edition we find

Malice - In the law of libel and Slander - an evil intent or motive arising from Spite or ill will; personal hatred or ill will; Culpable recklessness or a willful and wanton disregard of the rights and interest of the person defamed. -

MacDonald v. Brown 23 R.I. 546, 51 A.H. 213, 58 L.R.A. 768, 91 Am. St. Rep. 659; Hearne v. De Young 132 Cal. 357, 64 Pac 576, Cherry v. Des Moines Leader 114 Iowa, 298, 86 N.W. 323, 54, L.R.A. 855, 89 Am. St. Rep 365; Mink v. Bridgstreet Co. 174 Mo. 444, 73 S.W. 668

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Abuse of Process - improper or tortious use of a legitimately issued court process to obtain a result that is either unlawful or beyond the process scope. - Also termed Abuse of legal process; Malicious abuse of process; Malicious abuse of legal process; Wrongful process; Wrongful process of law. (cf Malicious Prosecution.

"One who uses a legal process, whether

Criminal or civil, against another primarily to accomplish a purpose for which it is not designed is subject to liability to the other for harm caused by the abuse of process." - Restatement (second) of tort § 682 (1977)

In New York State Consolidated laws Chapter 6, Article 7, Section 70 - Vexatious Suits it is clear that remedy is afforded when dealing with the issues that gave rise to this action. So does Chapter 6 Article 2 Section 8 Give me the right as well as the 4th Amendment of the Constitution of the United States of America allows me to tell you that your request is not within the scope of discovery, first Amendment violations constitute irreparable harm. This is held up in the Supreme Court!

"The loss of first Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 U.S. 347 (1976)

I have been following the Creed of Islam for many years, I am a Moorish American Muslim and I practice Islamism as my religion. It is my job to take care of my heirs. In the Divine Constitution and By laws

Of the Moorish Science Temple of America

Act 7- All members must promptly attend their meetings and become a part and partial of all uplifting acts of the Moorish Science Temple of America. Members must pay their dues and keep in line with all necessities of the Moorish Science Temple of America. Then you are entitled to the name of "faithful." Husband, you must support your wife and children; wife you must obey your husband and take care of your children and look after the duties of your household. Sons and daughters must obey father and mother and be industrious and become a part of the uplifting of fallen humanity. All Moorish Americans must keep their hearts and minds pure with love, and their bodies clean with water. This Divine Covenant is from your Holy Prophet Noble Drew Al. thro the guidance of his Father God Allah.

Further In the Holy Koran of the Moorish Science Temple of America Chapter XXIII Instructions 1-4

① Consider, thou art a parent, the importance of thy trust; the being thou hast produced, it is thy duty to support.

2. Upon thee also it dependeth whether the child of thy bosom be a blessing or a curse to thyself; an useful or a worthless member to the community.

3. Prepare him early with instruction, and Season his mind with the maxims of truth.

4. Watch the bent of his inclinations, Set him right in his youth and let no evil habit gain strenght with his years.

All Parties failed to listen to my grievances, they didnt investigate I called NYPD, Pix 11 New, The FBI, NYC DOE and filed this proceeding.

No Doctor Can describe What life has been like dealing with the atrocities and violations we have and continue to experience daily. What happened to my tribe is Common Practice of Administration of Children Services, their employees, Agencies, Agents, Contractors etc & New York City Police Dept and their officers. Systematic discrimination ~~abuse~~ blanketed as policy and law.

It is my personal opinion that this discovery request is yet another

insult of my intelligence and disregard
to an over 20 year Public
Safety issue plaguing New York State
and frankly the United States of
America as a whole.

Peace and Love
I am All Rights Reserved
Wister E Jones Bey

Lyrics Playhouse Maanish Sudbury Theatre
P.O. Box 180
Bronx New York 10472

P.S. I have resubmitted my request to
you and to the Court.